



**SEACURE ADVISORS**

## **SeaCure Advisors LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: April 16, 2019**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of SeaCure Advisors LLC (herein “SeaCure” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (877) 328-4037.

SeaCure is a registered investment advisor located in the States of Florida and Kentucky. Registration does not imply a certain level of skill or training. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through SeaCure to assist you in determining whether to retain the Advisor.

Additional information about SeaCure and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 170079.

**SeaCure Advisors LLC**

**Phone: (877) 328-4037**

**Florida Office: 677 North Washington Blvd., Sarasota, FL 34236**

**Kentucky Office: 219 East High Street, Lexington, KY 40507**

**South Carolina Office: 4 Leas Courtyard Drive, Seneca, SC 29672**

**Phone: (877) 328-4037 | <http://www.seacureadvisors.com>**

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of SeaCure.

SeaCure believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. SeaCure encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The Advisor has added a new office location in Seneca, South Carolina.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of SeaCure.

At any time, you may view the current Disclosure Brochure on our website at [www.seacureadvisors.com](http://www.seacureadvisors.com) or online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 170079. You may also request a copy of this Disclosure Brochure at any time by contacting us at (877) 328-4037.

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## Item 4 – Advisory Business

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### A. Firm Information

SeaCure Advisors LLC (herein “SeaCure” or the “Advisor”) is a registered investment advisor in the States of Florida, Kentucky and Massachusetts, which is organized as a limited liability company (“LLC”) under the laws of Florida. SeaCure was founded in June 2013 and became a registered investment advisor in April 2014. SeaCure is owned and operated by Carolyn B. Howard (Managing Member). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SeaCure.

### B. Advisory Services Offered

SeaCure offers investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Advisory Services

SeaCure provides customized investment advisory solutions for its Clients. SeaCure provides discretionary investment management services for its Clients. SeaCure works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. SeaCure will typically utilize various investment management programs to implement the portfolio strategy.

SeaCure typically recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a turnkey asset management program (“TAMP”). The Client will then enter into a program and investment advisory agreement with the TAMP (the “Program Sponsor”) and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account[s], the selection of the money manager[s], and defining any restrictions on the account[s] and determining any changes to portfolio strategy. SeaCure will provide ongoing oversight of the Client account[s] and the activities of the unaffiliated money manager[s] selected to manage the Client’s assets.

The money manager[s] will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add SeaCure’s investment advisory fee (described below in Item 5) and will deduct the overall fee from the Client’s account[s] on a monthly or quarterly basis. The asset-based program fee is tiered and varies depending on the size of the account[s], the asset class of the underlying securities and the sub-advisor selected. The overall fee (including the Advisor’s investment advisory fee) will not exceed 2.50% annually.

**SeaCure does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than SeaCure’s investment advisory fee (described in Item 5).**

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor’s Form ADV Part 2A (or a brochure that makes the appropriate disclosures). In addition, SeaCure and its Client will agree in writing that that selected Program Sponsor will manage the Client’s account[s] on a discretionary basis.

#### Financial Planning Services

SeaCure will typically provide a variety of financial planning services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation.

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Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. SeaCure may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

In addition to investment advisory services, Ms. Howard also consults other Registered Investment Advisor's on how to breakaway from their current broker-dealer registration.

#### Retirement Plan Advisory Services

SeaCure provides 3(38) retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor shall have the discretion to select the investments for the Plan and/or make investment decisions on behalf of Plan Participants. The Advisor's services generally include:

- Employee Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Due Diligence
- Investment Management Services (Discretionary)
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

These services are provided by SeaCure serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of SeaCure's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### **C. Client Account Management**

Prior to engaging SeaCure to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – SeaCure, in connection with the Client, will develop a strategy targeted to achieve the Client's investment goals and objectives.

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- Asset Allocation – SeaCure will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – SeaCure will develop a portfolio strategy for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Supervision – SeaCure will provide ongoing investment oversight of the Client’s investment portfolio.

#### **D. Wrap Fee Programs**

SeaCure does not manage a wrap fee program. If the Advisor suggests a wrap fee program offered by a TAMP, the Advisor will also provide the Client with a copy of the applicable wrap program brochure.

#### **E. Assets Under Management**

As of December 31, 2018, SeaCure manages \$18,292,030 in assets under management, all of which were managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements with the Advisor that detail the responsibilities of SeaCure and the Client.

#### **A. Fees for Advisory Services**

##### Investment Advisory Services

Investment advisory fees are billed monthly or quarterly (the “billing period”) in arrears, based on the terms of the investment advisory agreement. Fees are billed at an annual rate of up to 1.25% of assets under management. The Client’s fee will be deducted from the Client’s account[s] with the respective Program Sponsor and a portion of the fee will be provided to the Advisor based on SeaCure’s agreement with the Client. SeaCure is responsible for negotiating the fees with the Program Sponsor on behalf of the Client. SeaCure does not receive any compensation or fees from any Program Sponsor. The Client’s fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by SeaCure will be independently valued by the Custodian or TAMP. SeaCure will not have the authority or responsibility to value portfolio securities.

##### Financial Planning Services

SeaCure offers financial planning services at an hourly rate of \$200 per hour or as a fixed engagement fee. Fixed fees generally range from \$3,000 to \$10,000, but may be higher for more complex or long-term engagements. Fees are negotiable and based on the nature and complexity of each Client’s circumstances. An estimate of total fees will be provided to the Client prior to engaging for these services.

##### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.00%, billed in arrears, pursuant to the terms of the retirement plan advisory agreement. Retirement plan fees are based on the market value of assets under management at the end of the prior calendar quarter. Fees may be negotiable depending on the size and complexity of the Plan.

The Advisor’s fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### **B. Fee Billing**

##### Investment Advisory Services

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Investment advisory fees are calculated by the Custodian or Program Sponsor and deducted from the Client's account[s] at the Custodian. The Client shall instruct the Custodian or Program Sponsor to automatically deduct the investment advisory fee from the Client's account[s] for the respective billing period and pay the investment advisory fee to the Advisor. The amount due is calculated by applying the billing period rate (annual rate divided by 12 or 4, respectively) to the total assets under management with SeaCure at the end of each billing period. Clients will be provided with a statement, at least quarterly, from the Custodian or Program Sponsor reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by SeaCure directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees are typically invoiced fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

#### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than SeaCure, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The investment advisory fee charged by SeaCure is separate and distinct from these custody and execution fees.

In addition, all fees paid to SeaCure for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of SeaCure, but would not receive the services provided by SeaCure which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by SeaCure to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Investment Advisory Services

SeaCure is compensated for its investment advisory services at the end of the billing period, after services are rendered. Either party may request to terminate their investment advisory agreement with SeaCure, at any time, by providing written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for investment advisory fees and applicable Program Sponsor Fees up to and including the date written notice of termination is received. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Financial Planning Services

SeaCure may be partially compensated for its financial planning services at the start of the planning engagement. Either party may request to terminate their financial planning agreement with SeaCure, at any time, by providing seven (7) days written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for fees based on the hours worked

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by the Advisor or the percentage completed for a fixed fee engagement. Any unearned, prepaid fees will be promptly refunded. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### Retirement Plan Advisory Services

SeaCure is compensated for its services at the end of the quarter after advisory services are rendered. Either party may request to terminate a retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

SeaCure does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

#### Insurance Agency Affiliations

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, the Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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SeaCure does not charge performance-based fees for its investment advisory services. The fees charged by SeaCure are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

SeaCure does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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SeaCure offers investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. SeaCure generally does not impose a minimum account size for establishing a relationship.

#### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

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##### **A. Methods of Analysis**

SeaCure primarily utilizes the investment management services of unaffiliated money managers. SeaCure generally advocates a long-term investment strategy for its Clients, as consistent with their financial goals. However, certain managers may hold all or a portion of a security for more than a year, but may also hold for shorter periods consistent with the respective investment mandate.

##### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. SeaCure will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

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Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategy:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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We encourage all Clients to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 170079. In addition, Clients may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

### **Item 10 – Other Financial Industry Activities and Affiliations**

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#### Insurance Agency Affiliations

As noted in Item 5.E., certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by an Advisory Person are separate and in addition to Seacure's advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent

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has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through an Advisory Person.

#### Unaffiliated Money Managers

The Advisor may recommend that all or a portion of a Client's portfolio be implemented using one or more Program Sponsor. Please see item 4 above as well as Item 14.

#### Breeze Financial, LLC

Ms. Breeze is the Owner and Operator of Breeze Financial, LLC, an independent insurance firm. In her separate role with Breeze Financial, Ms. Breeze advises, counsels and sells various insurance products to individuals and groups of employees. Clients are under no obligation to implement any recommendations made by Ms. Breeze.

#### Miller Financial Group

Mr. Miller is the Owner and Operator of Miller Financial Group, an independent insurance firm. In his separate role with Miller Financial Group, Mr. Miller advises, counsels and sells various insurance products to individuals and groups of employees. Clients are under no obligation to implement any recommendations made by Mr. Miller.

### **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

#### **A. Code of Ethics**

SeaCure has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with SeaCure (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. SeaCure and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SeaCure associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (877) 328-4037.

#### **B. Personal Trading with Material Interest**

SeaCure allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SeaCure does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. SeaCure does not have a material interest in any securities traded in Client accounts.

#### **C. Personal Trading in Same Securities as Clients**

SeaCure allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of SeaCure may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by SeaCure requiring reporting of personal securities, trades by its employees for review by the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

While SeaCure allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will SeaCure, or any Supervised Person of SeaCure, transact in any security to the detriment of any Client.**

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#### **SeaCure Advisors LLC**

Florida Address: 677 North Washington Blvd., Sarasota, FL 34236  
Kentucky Office: 219 East High Street, Lexington, KY 40507  
South Carolina Office: 4 Leas Courtyard Drive, Seneca, SC 29672  
Phone: (877) 328-4037 | <http://www.seacureadvisors.com>

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

SeaCure does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize SeaCure to direct trades to the Custodian as agreed upon in the investment advisory agreement and separate forms provided by the Program Sponsor, as applicable. Further, SeaCure does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where SeaCure does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by SeaCure. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. SeaCure may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices. SeaCure will generally recommend that Clients establish their account[s] at SEI Private Trust Company, a subsidiary of SEI Investments Company ("SPTC"). SeaCure, through certain managed account programs, may have Clients establish their accounts at Fidelity Clearing & Custody Solutions and its affiliated entities under Fidelity Investments, Inc. (collectively "Fidelity"), or TD Ameritrade, Inc. ("TD Ameritrade"), FINRA registered broker-dealers and members SIPC. SPTC, Fidelity, or TD Ameritrade (each a "Custodian") will serve as the Client's "qualified custodian". The Advisor receives some benefits from the Custodian through its participation in the Custodian's institutional platform. Please see the disclosure under Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodian whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. SeaCure does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain benefits from the Custodians, as detailed in Item 14 below.

**2. Brokerage Referrals** - SeaCure does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where SeaCure will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). SeaCure will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### B. Aggregating and Allocating Trades

Although SeaCure does not aggregate or "batch" trades, the primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. SeaCure or the Unaffiliated Money Manager[s] will execute each transaction through the Custodian designated by the Client. SeaCure or the Unaffiliated Money Manager[s] will seek to execute securities transactions by the close of each business day in a manner that does not consistently advantage or disadvantage any particular Client accounts.

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## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Ms. Howard, Chief Compliance Officer of SeaCure. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify SeaCure if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may, on an ad-hoc basis, also provide Clients with periodic written reports regarding their holdings, allocations, performance, and other account details.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by SeaCure**

#### Participation in Institutional Advisor Platform (SPTC)

SeaCure has established an institutional relationship with SPTC to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at SPTC. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of a custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from SPTC: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### Participation in Institutional Advisor Platform (TD Ameritrade)

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third party

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vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

#### Participation in Institutional Advisor Platform (Fidelity)

SeaCure has established institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services.

#### Unaffiliated Money Manager

The Advisor may be indirectly compensated by the Program Sponsor as described in Item 5 above and does not receive any other forms of compensation with such arrangements.

#### **B. Client Referrals from Solicitors**

SeaCure does not engage paid solicitors for Client referrals. However, the Advisor is affiliated with Elite Resource Team (herein "ERT"). ERT introduces Certified Public Accountants ("CPAs") and Registered Investment Advisors ("RIAs") to assist the Client in additional services based on Client needs. There is no compensation being shared through the CPA or RIAs.

#### **Item 15 – Custody**

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SeaCure does not accept or maintain custody of any Client accounts, other than the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct SeaCure to utilize the Custodian for the Client's security transactions. SeaCure encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

#### **Item 16 – Investment Discretion**

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SeaCure generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by SeaCure. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by SeaCure will be in accordance with each Client's investment objectives and goals.

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## **Item 17 – Voting Client Securities**

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SeaCure does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither SeaCure, nor its management, have any adverse financial situations that would reasonably impair the ability of SeaCure to meet all obligations to its Clients. Neither SeaCure, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. SeaCure is not required to deliver a balance sheet along with this Disclosure Brochure, as the Advisor does not collect advance fees of \$500 for services to be performed six months or more in advance.

## **Item 19 – Requirements for State Registered Advisors**

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### **A. Educational Background and Business Experience of Principal Officer**

The Managing Member and Chief Compliance Officer of SeaCure is Carolyn B. Howard. Information regarding the formal education and background of Ms. Howard is included in her Form ADV Part 2B – Brochure Supplement below.

### **B. Other Business Activities of Principal Officer**

#### Insurance Agency Affiliations

Ms. Howard is also a licensed insurance professional. Insurance recommendations and implementations are separate and apart from Ms. Howard's role with SeaCure. As an insurance professional, Ms. Howard may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Howard is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or by Ms. Howard.

### **C. Performance Fee Calculations**

SeaCure does not charge performance-based fees for its investment advisory services. The fees charged by SeaCure are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

### **D. Disciplinary Information**

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

### **E. Material Relationships with Issuers of Securities**

Neither SeaCure nor Ms. Howard have any relationships or arrangements with issuers of securities.

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**SEACURE ADVISORS**

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Carolyn B. Howard, CFP®  
Managing Member and Chief Compliance Officer**

**Effective: April 16, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Carolyn B. Howard (CRD# **2391466**) in addition to the information contained in the SeaCure Advisors LLC (“SeaCure” or the “Advisor”) (CRD # 170079) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SeaCure Disclosure Brochure or this Brochure Supplement, please contact us at (877) 328-4037.

Additional information about Ms. Howard is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her individual CRD# 2391466.

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## Item 2 – Educational Background and Business Experience

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Carolyn B. Howard, born in 1947, is dedicated to advising Clients of SeaCure in her role as the Managing Member and the Chief Compliance Officer. Ms. Howard earned a Masters of Education from Boston University in 1971. Ms. Howard earned a Bachelor of Science from the University of Kentucky in 1968. Additional information regarding Ms. Howard's employment history is included below.

### Employment History:

Managing Member and Chief Compliance Officer, SeaCure Advisors LLC	01/2014 to Present
Financial Advisor, Northface Capital Holdings, LLC d/b/a Pegaesus Advisors	07/2011 to 07/2014
Financial Advisor, LPL Financial	07/2011 to 02/2014
President, Pegaesus Advisors, Inc.	07/2003 to 09/2011

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. We encourage you to independently view the background of Ms. Howard on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2391466.

### **Item 4 – Other Business Activities**

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#### Insurance Agency Affiliations

Ms. Howard is also a licensed insurance professional. Insurance recommendations and implementations are separate and apart from Ms. Howard's role with SeaCure. As an insurance professional, Ms. Howard may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Howard is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or by Ms. Howard.

#### 219 E. High St. LLC

Ms. Howards is a partner of 219 E. High St. LLC which owns real estate property. Clients are not solicited to invest in these properties.

#### The College Planning Network

Ms. Howard, in her separate capacity, is affiliated with The College Planning Network ("CPN"). CPN is a national organization that educates families on how to deal with college expenses as well as help students navigate the college entrance process. Ms. Howard is not compensated in this position.

### **Item 5 – Additional Compensation**

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Ms. Howard has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Ms. Howard serves as the Managing Member and Chief Compliance Officer of SeaCure. Ms. Howard can be reached at (877) 328-4037. SeaCure has implemented a Code of Ethics, an internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of SeaCure. Further, SeaCure is subject to regulatory oversight by various agencies. These agencies require registration by SeaCure and its Supervised Persons. As a registered entity, SeaCure is subject to examinations by regulators, which may be announced or unannounced. SeaCure is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

### **Item 7 – Requirements for State Registered Advisors**

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Ms. Howard does not have any additional information to disclose.

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**SEACURE ADVISORS**

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Robert P. Miller, CFP®  
Investment Advisor Representative**

**Effective: April 16, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Robert P. Miller, CFP® (CRD# **2829949**) in addition to the information contained in the SeaCure Advisors LLC (“SeaCure” or the “Advisor”) (CRD # 170079) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SeaCure Disclosure Brochure or this Brochure Supplement, please contact us at (877) 328-4037.

Additional information about Mr. Miller is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 2829949.

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## Item 2 – Educational Background and Business Experience

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Robert P. Miller, CFP®, born in 1949, is dedicated to advising Clients of SeaCure as an Investment Advisor Representative. Mr. Miller earned a Bachelor's in political science from Long Island University in 1971. Additional information regarding Mr. Miller's employment history is included below.

### Employment History:

Investment Advisor Representative, SeaCure Advisors LLC	04/2014 to Present
Account Executive, ABC Insurance Trust	07/1997 to Present
Principal, Miller Financial Group	06/1995 to Present
Investment Advisor Representative, Northface Capital Holdings, LLC d/b/a Pegaesus Advisors	12/2011 to 07/2014
Financial Advisor, LPL Financial LLC	03/2012 to 10/2013
Investment Advisor Representative, Pegaesus Advisors, Inc.	08/2004 to 12/2011

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP®

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Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. There are no legal, civil or disciplinary events to disclose regarding Mr. Miller. However, we do encourage you to independently view the background of Mr. Miller on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching with his full name or his Individual CRD# 2829949.

### **Item 4 – Other Business Activities**

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#### Insurance Agency Affiliations

Mr. Miller is also a licensed insurance professional with Miller Financial Group. Insurance recommendations and implementations are separate and apart from Mr. Miller's role with SeaCure. As an insurance professional, Mr. Miller may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Miller is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or by Mr. Miller.

### **Item 5 – Additional Compensation**

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Mr. Miller has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Miller serves as the Investment Advisor Representative of SeaCure and is supervised by Carolyn Howard, the Chief Compliance Officer. Ms. Howard can be reached at (877) 328-4037. SeaCure has implemented a Code of Ethics, an internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of SeaCure. Further, SeaCure is subject to regulatory oversight by various agencies. These agencies require registration by SeaCure and its Supervised Persons. As a registered entity, SeaCure is subject to examinations by regulators, which may be announced or unannounced. SeaCure is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

### **Item 7 – Requirements for State Registered Advisors**

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Mr. Miller does not have any additional information to disclose.

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**SEACURE ADVISORS**

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Patricia M. Breeze, CLU<sup>®</sup>, CFP<sup>®</sup>  
Investment Advisor Representative**

**Effective: April 16, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Patricia M. Breeze (CRD# **1031412**) in addition to the information contained in the SeaCure Advisors LLC (“SeaCure” or the “Advisor”) (CRD # 170079) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SeaCure Disclosure Brochure or this Brochure Supplement, please contact us at (877) 328-4037.

Additional information about Ms. Breeze is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Educational Background and Business Experience

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Patricia M. Breeze, born in 1947, is dedicated to advising Clients of SeaCure as an Investment Advisor Representative. Ms. Breeze earned a Bachelor of Arts Degree from the University of Kentucky in 1969. Ms. Breeze earned a Master of Arts Degree from the University of Kentucky in 1973. Additional information regarding Ms. Breeze's employment history is included below.

### Employment History:

Investment Advisor Representative, SeaCure Advisors LLC	12/2014 to Present
Investment Advisor Representative, CSSC Investment Advisory Services, Inc	03/2002 to 12/2014
Career Insurance Agent & Registered Representative, MassMutual Financial Group	10/1984 to 03/2002

### The Chartered Life Underwriter ("CLU®")

The Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

#### Program Objectives:

- Provide guidance to clients on types and amounts of life insurance needed
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues
- Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients

### CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

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- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### **Item 3 – Disciplinary Information**

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. There are no legal, civil or disciplinary events to disclose regarding Ms. Breeze. However, we do encourage you to independently view the background of Ms. Breeze on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching with her full name or her Individual CRD# 1031412.

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### **Item 4 – Other Business Activities**

#### Breeze Financial, LLC

Ms. Breeze is the Owner and Operator of Breeze Financial, LLC (“Breeze Financial”). Breeze Financial is an insurance firm, where Ms. Breeze advises, counsels and sells various insurance products to individuals and groups of employees. Clients are under no obligation to implement any recommendations made by Ms. Breeze.

#### Real Estate Properties

Ms. Breeze owns several real estate properties. Clients are not solicited to invest in these properties.

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### **Item 5 – Additional Compensation**

Ms. Breeze has additional business activities where compensation is received that are detailed in Item 4 above.

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### **Item 6 – Supervision**

Ms. Breeze serves as an Investment Advisor Representative of SeaCure and is supervised by Carolyn Howard, the Chief Compliance Officer. Ms. Howard can be reached at (877) 328-4037. SeaCure has implemented a Code of Ethics, and internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of SeaCure. Further, SeaCure is subject to regulatory oversight by various agencies. These agencies require registration by SeaCure and its Supervised Persons. As a registered entity, SeaCure is subject to examinations by regulators, which may be announced or unannounced. SeaCure is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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### **Item 7 – Requirements for State Registered Advisors**

Ms. Breeze does not have any additional information to disclose.

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**SEACURE ADVISORS**

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jonathan D. Howard  
College Planning Specialist**

**Effective: April 16, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jonathan D. Howard (CRD# 4117552) in addition to the information contained in the SeaCure Advisors LLC (“SeaCure” or the “Advisor”, CRD# 170079) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SeaCure Disclosure Brochure or this Brochure Supplement, please contact us at (877) 328-4037.

Additional information about Mr. Howard is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4117552.

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## Item 2 – Educational Background and Business Experience

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Jonathan D. Howard, born in 1976, is dedicated to advising Clients of SeaCure as the College Planning Specialist. Mr. Howard earned a Bachelor of Science from Middlebury College in 1998. Additional information regarding Mr. Howard’s employment history is included below.

### Employment History:

College Planning Specialist, SeaCure Advisors LLC	06/2017 to Present
Senior Nuke Compositor/Compositing Supervisor, Framestore VFX	01/2017 to 06/2017
Senior Nuke Compositor, Zoic Studios	10/2016 to 12/2016
Senior Nuke Compositor/VFX Supervisor, Deutsch	07/2015 to 09/2016
Nuke Compositor, The Mill	08/2015 to 03/2016
Senior Nuke Compositor, Nomad Editing Company	07/2014 to 07/2015
Finishing Artist, HutchCo Technologies	01/2011 to 01/2015
VFX Supervisor/Finishing Artist, Nightshift Post	01/2014 to 10/2014

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. There are no legal, civil or disciplinary events to disclose regarding Mr. Howard. However, we do encourage you to independently view the background of Mr. Howard on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4117552.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Howard is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Howard’s role with SeaCure. As an insurance professional, Mr. Howard may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Howard is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Howard or the Advisor.

### The College Planning Network

Mr. Howard, in his separate capacity, is affiliated with The College Planning Network (“CPN”). CPN is a national organization that educates families on how to deal with college expenses as well as help students navigate the college entrance process. Mr. Howard is not compensated in this position.

## Item 5 – Additional Compensation

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Mr. Howard has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Howard serves as the College Planning Specialist of SeaCure and is supervised by Carolyn Howard, the Chief Compliance Officer. Ms. Howard can be reached at (877) 328-4037.

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SeaCure has implemented a Code of Ethics, an internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of SeaCure. Further, SeaCure is subject to regulatory oversight by various agencies. These agencies require registration by SeaCure and its Supervised Persons. As a registered entity, SeaCure is subject to examinations by regulators, which may be announced or unannounced. SeaCure is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

### **Item 7 – Requirements for State Registered Advisors**

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Mr. Howard does not have any additional information to disclose.

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## Privacy Policy

Effective: April 16, 2019

### Our Commitment to You

SeaCure Advisors LLC (herein “SeaCure” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. SeaCure (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

SeaCure does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered investment advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> SeaCure does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where SeaCure or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> SeaCure does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (877) 328-4037.

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